

December 8, 2008

Mr. Andrew McGilvray  
Executive Secretary  
Foreign Trade Zone Board  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Room 2111  
Washington, DC 20230

Dear Mr. McGilvray:

This letter is filed by the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied-Industrial and Service Workers International Union ("USW") in opposition to the request by the City of Mobile, Alabama, to establish a foreign trade subzone in FTZ 82 for ThyssenKrupp Steel and Stainless USA and its affiliates ("ThyssenKrupp.")<sup>1</sup> The application was filed on October 1, 2008. After reviewing the application for subzone status, the USW believes that the granting of this request is not in the public interest and should be denied by the Foreign Trade Zone Board ("the Board").

The USW is the largest industrial Union in North America with 850,000 active members manufacturing a broad range of products, ranging from paper to aluminum to rubber and plastics. We represent workers in the basic metals industries. These workers would be adversely affected by the granting of subzone status for the ThyssenKrupp mill in Calvert, Alabama. Allowing this

<sup>1</sup> This letter responds to the request for public comment on the FTZ subzone application. *Foreign-Trade Zone 82—Mobile, AL; Application for Subzone; ThyssenKrupp Steel and Stainless USA, LLC, (Stainless and Carbon Steel Products), Calvert, AL*, 73 Fed. Reg. 58535-58536, (October 7, 2008).

facility to import inputs duty free would provide this mill an unfair advantage over competing U.S. mills that are required to pay duties on their inputs. The USW believes that it is not in the public interest of the United States to give a single mill a competitive advantage to the detriment of other mills in the United States.<sup>2</sup> Moreover, the U.S. steel industry and its workers continue to suffer the consequences of unfairly traded steel products, and these effects increase the vulnerability of these facilities to other forms of unfair competition.

In addition, the ThyssenKrupp facility in Calvert, Alabama is already under construction and will be completed before final consideration of the application for subzone status. The grant of subzone status is not a predicate for the construction and operation of this facility and will not result in “significant public benefit” as required under 15 C.F.R. § 400.31(c)(3). The ThyssenKrupp venture has already enjoyed enormous financial support from state and local authorities in Alabama, and the grant of subzone status will only increase the unfair advantage to ThyssenKrupp from government support.

Finally, the deteriorating conditions in the U.S. economy have already begun to have a serious negative impact on U.S. steel producers and steel production. Plants have been idled, and workers have been laid off. The USW submits that this is no time to be providing a substantial competitive advantage to a single, non-unionized steel mill when the rest of the industry is already suffering from a major economic downturn, and idled U.S. steel capacity.

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<sup>2</sup> 15 U.S.C. § 400.31(a).

**1. The United States Industry Producing Carbon and Stainless Steel Flat Products Has Long Been Battered by Unfair Foreign Competition**

The USW submits that the proposed subzone is not consistent with U.S. trade policy and does not support the objectives of the U.S. government for a strong and globally competitive domestic carbon and stainless steel industry, as required by 15 C.F.R. § 400.31(b)(1). The domestic steel industry has long been subjected to unfair foreign trade practices, including those followed by the very company applying for this subzone. The U.S. government should not be picking winners and losers in the U.S. steel sector. By granting FTZ subzone status to ThyssenKrupp, the U.S. government would be giving a tremendous cost advantage in the form of lower duties on imported equipment and inputs to a single company, to the detriment of other U.S. steel producing companies, many of which are represented by the USW. No other steelmaking plant facility in the United States has this status.

As noted in the FTZ subzone application itself, the U.S. steel industry has long had to compete with low cost imported steel products.<sup>3</sup> The application states that in 2001, 30 U.S. steel companies had to declare bankruptcy and shut down operations.<sup>4</sup> In fact, the period 1998-2003 was devastating for U.S. steel companies and steelworkers. During this period, steel prices fell to 20-year lows, losses in the industry exceeded \$12 billion, and there were 45 steel company bankruptcies, with 18 mills shuttered permanently.<sup>5</sup> Huge sacrifices were made by U.S.

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<sup>3</sup> Application to Establish a Foreign Trade Subzone to Foreign Trade Zone Number 82 for ThyssenKrupp Steel and Stainless USA, LLC, and Affiliates, ("Application"), October 1, 2008 at 8.

<sup>4</sup> *Id.*

<sup>5</sup> The State of Steel, presentation by Tom Conway, USW Vice President International at the Basic Steel Industry Conference, Pittsburgh, PA, December 17, 2007 ("2007 State of Steel Presentation") at slide 5. <http://legacy.usw.org/usw/program/content/4444.php>. See, **Exhibit 1**.

steelworkers during this period, when 55,000 steelworkers lost their jobs.<sup>6</sup> There were 16 terminations of distressed pension plans by the Pension Benefit Guaranty Corporation, involving over 250,000 participants and \$10 billion in underfunded benefits.<sup>7</sup> Three hundred thousand retirees and their dependents lost their health care.<sup>8</sup>

In 2003, the President of the United States imposed tariffs and quotas on a variety of steel products in an effort to help the U.S. industry compete against the surge in low cost imported steel.<sup>9</sup> These measures were lifted in 2004.<sup>10</sup> During the period the measures were in effect, the U.S. industry made significant efforts to restructure and rationalize. Demand for steel in the U.S. market remained strong -- growing by 150% from 2003 to 2006.<sup>11</sup> Despite these efforts, however, the damage from cheap imports was done, and from 2003 to 2006, U.S. production increased by only 9 percent while imports grew by 23 percent.<sup>12</sup>

USW workers continue to take constructive measures to help the U.S. industry remain viable and competitive and have been at the forefront of efforts to restructure the U.S. industry in a manner that protects the rights of workers, their livelihoods and benefits.

Carbon and stainless steel flat products (the products that will be produced by ThyssenKrupp in the proposed subzone) remain subject to antidumping and countervailing duty

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<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> *See*, Application at 8.

<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at 8-9.

<sup>12</sup> *Id.* at 9.

orders from several countries. These products include Carbon Steel Plate, Stainless Steel Plate in Coils, Hot-Rolled Carbon Steel Flat Products, and Stainless Steel Sheet and Strip. A full list of on-going flat-rolled carbon and stainless steel orders and suspension agreements in effect is contained in **Exhibit 2**. These orders were just renewed in Sunset Reviews conducted by the Department of Commerce and the International Trade Commission in 2005 and in 2007, confirming the likelihood that dumping and subsidies would resume and cause injury to the U.S. steel industry if the orders were revoked.<sup>13</sup> The continued existence of these orders and suspension agreements is a clear indication that the U.S. industry producing carbon and stainless steel flat products remains vulnerable to unfair trade from other countries. Additional advantages, such as those that would accrue to ThyssenKrupp by not having to pay import duties on inputs and capital equipment, would cause harm to other competing producers in the United States. The USW participated in these cases.

More importantly, ThyssenKrupp itself is subject to four outstanding antidumping orders. It continues to pay deposits of estimated antidumping duties in these proceedings. These orders include Corrosion-Resistant Carbon Steel Flat Products from Germany, which covers ThyssenKrupp Steel AG; Stainless Steel Sheet and Strip in Coils from Germany, which covers ThyssenKrupp Nirosta GmbH, ThyssenKrupp Nirosta Präzisionsband GmbH, and ThyssenKrupp VDM GmbH; Stainless Steel Sheet and Strip in Coils from Italy, which covers ThyssenKrupp

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<sup>13</sup> The USW participated in these cases, and testified before the International Trade Commission in the Sunset Reviews in Hot-Rolled Steel, Corrosion-Resistant Steel, Cut-to-Length Carbon Quality Steel Plate, Certain Stainless Steel Plate, and Stainless Steel Sheet and Strip in Coils.

Acciai Speciali Terni, S.p.A and ThyssenKrupp AST USA; and Stainless Steel Sheet and Strip in Coils from Mexico, which covers ThyssenKrupp Mexinox, S.A. de C.V.<sup>14</sup>

It would be inconsistent with U.S. trade policy to provide ThyssenKrupp's U.S. subsidiary with considerable competitive advantages in the form of remission of duties on imported inputs and capital equipment, when ThyssenKrupp is continuing to engage in unfair trade with respect to exports to the United States of steel products from Germany, Italy, and Mexico.

**2. The Granting of Subzone Status to ThyssenKrupp's Alabama Mill Will Not Result in a Net Economic Benefit to the United States**

The Application asserts that the granting of subzone status to the ThyssenKrupp mill will result in a significant increase in U.S. manufactured steel production capacity and employment.<sup>15</sup> While the USW is pleased that manufacturing is occurring in the United States and jobs are being created here, the Application itself demonstrates that any increase in capacity and employment would occur regardless of whether or not subzone status is granted. The request for subzone status was not a predicate for constructing the facility in the first place. In fact, the Application states that "FTZ status is not a precondition for construction or activity at the proposed site."<sup>16</sup> As the Application further notes, the groundbreaking for the Alabama mill was

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<sup>14</sup> See, *Corrosion-Resistant Carbon Steel Flat Products from Germany; Rescission of Antidumping Duty Administrative Review*, 73 Fed. Reg. 3943, January 23, 2008; *Stainless Steel Sheet and Strip in Coils from Germany; Notice of Final Results of Antidumping Administrative Review*, 71 Fed. Reg. 74897, December 13, 2006; *Implementation of the Findings of the WTO Panel in U.S. Zeroing (EC) Notice of Determination Under Section 129 of the Uruguay Round Agreements Act: Antidumping Order on Stainless Steel Sheet and Strip in Coils from Italy*, 72 Fed. Reg. 54640, September 26, 2007; and *Stainless Steel Sheet and Strip in Coils from Mexico; Preliminary Results of Antidumping Duty Administrative Review*, 73 Fed. Reg. 45708, August 8, 2008.

<sup>15</sup> Application at 4.

<sup>16</sup> Application at 25.

on November 11, 2007.<sup>17</sup> Yet, ThyssenKrupp did not submit the application for subzone status until nearly a year after the groundbreaking and 18 months after the original decision was made by ThyssenKrupp to construct a mill in Alabama.<sup>18</sup> Thus, it is clear that the decision to build the mill was taken without regard to any notable advantage that would be a prerequisite for construction of the mill.

ThyssenKrupp states that the subzone designation will allow the company to produce stainless and carbon steel products more efficiently in the United States, thereby encouraging the company to maintain and expand its investment in the production of steel in the United States.<sup>19</sup> ThyssenKrupp, however, did not consider that having a subzone designation was necessary to making its investment decision in the first place, and it is vague about how such a designation would result in any expansion in the future. The Application only notes that if the venture is “successful” (not defined anywhere) that the company has the “capability” to expand production and create new jobs there.<sup>20</sup> Nowhere does ThyssenKrupp state that it actually has such plans. What ThyssenKrupp must really mean is that such a designation would permit it to gain a considerable cost advantage over its domestic competitors by absolving the company of any import duty liability for imported inputs and capital equipment. This is not a sufficient basis for granting the designation. By putting the rest of the industry at a competitive disadvantage, there can be no net economic gain for the U.S. industry as a whole and such a grant cannot be seen to be in the “public interest.”

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<sup>17</sup> *Id.* at 23.

<sup>18</sup> “ThyssenKrupp Picks Alabama for \$3.7 Billion Steel Plant,” *International Herald Tribune*, May 11, 2007.

<sup>19</sup> *Id.* at 4.

<sup>20</sup> *Id.* at 5.

**3. The ThyssenKrupp Alabama Facility Has Already Benefitted from Enormous Government Support and Does Not Need Trade Zone Status**

Newspaper reports indicate that ThyssenKrupp received over \$811 million in cash, tax breaks, and other incentives from state and local governments in Alabama, or approximately 22 percent of the \$3.7 billion cost of building the facility. The incentives include \$461 million in direct payments composed of a \$314 million up front cash payment, and \$147 million for training programs, land purchases, site preparation, and road building.<sup>21</sup> ThyssenKrupp will also receive \$350 million in state and local tax abatements.<sup>22</sup> The \$811 million figure does not include the \$185 million in corporate income tax credits from which ThyssenKrupp will benefit over time.<sup>23</sup> The figure also does not include the \$115 million that the Port Authority of Alabama will spend on building a facility on Pinto Island for transferring steel from ocean bound vessels to barges.<sup>24</sup>

While state and local governments provide incentives to attract investment as they see fit, the federal government must consider the impact of assistance on all steel producers in the United States. Because the granting of trade zone status would only benefit ThyssenKrupp, and because of the large subsidies already provided to ThyssenKrupp by state and local authorities in Alabama, the Board should not increase the tremendous competitive advantage that ThyssenKrupp will enjoy by granting the additional benefit of duty-free status for significant steel making inputs and capital equipment.

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<sup>21</sup> See, "Record incentives will pay off, Riley says: critics object," *Birmingham News*, May 12, 2007, and "Incentives to steelmaker break state record," *Mobile Register*, May 12, 2007.

<sup>22</sup> *Id*

<sup>23</sup> *Id.*

<sup>24</sup> "Steel mill incentive accord signed," *Mobile Register*, May 15, 2007.



**4. The Current Condition of the United States Economy and the U.S. Steel Industry in Particular Does Not Warrant Providing ThyssenKrupp with Additional Competitive Advantages**

The U.S. steel industry has already begun to feel the effects of the economic meltdown of the U.S. economy. The reaction of U.S. producers has been to shut down or curtail production at basic steelmaking mills throughout the country. Layoffs have already started. In the past three weeks alone, the U.S. flat rolled steel industry has laid off over thousands of workers, according to press reports. Thousands of additional layoffs have occurred at downstream steel products producers, including pipe and tube, wire rod, steel bar, wire, and long products producers.

On November 24, 2008, ArcelorMittal informed the USW of its intent to temporarily lay off 490 workers at its Burns Harbor, Indiana facility.<sup>25</sup> In its announcement, ArcelorMittal stated, “potential workforce reductions are a direct result of the extraordinary economic environment we are facing and the company hopes to return workers to their jobs as market conditions warrant.”<sup>26</sup>

On November 14, 2008, USW officials were notified of the temporary layoff of 110 workers at Beta Steel’s Portage, Indiana hot band mill.<sup>27</sup> Union officials told reporters that the layoffs were entirely tied to a decline in steel demand. “It’s all tied to the economy,” Andre Joseph, vice president of the union told the newspaper. “There are no orders for steel.”<sup>28</sup>

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<sup>25</sup> “ArcelorMittal reducing layoffs at Burns Harbor,” *American Metal Market*, December 1, 2008.

<sup>26</sup> *Id.*

<sup>27</sup> “Beta Steel unit of NLMK cutting 110 jobs,” *American Metal Market*, November 17, 2008.

<sup>28</sup> *Id.*

On November 14, 2008, Severstal North America announced that it was extending the closure of its blast furnace at Sparrows Point, Maryland until January 2009, due to the severe weakening in market conditions in the North American market.<sup>29</sup>

The market downturn has also resulted in huge layoffs at AK Steel, a steel company that produces both carbon and stainless flat products and that competes directly with ThyssenKrupp throughout North America. On November 14, 2008, AK Steel announced that it would lay-off 34 workers at its Coshocton, Ohio stainless operations.<sup>30</sup> Coshocton produces stainless steel for the automotive and appliance industries. This announcement came on top of the announcement by AK Steel on November 12, 2008 that it was idling its Mansfield, Ohio operations and most of its Ashland, Kentucky operations. The Mansfield facility employs 365 workers and produces stainless flat-rolled products used in the automotive industry.<sup>31</sup> At least 600 workers are being laid-off at AK Steel's Ashland facility, which produces carbon flat rolled steel for the automotive, appliance and other applications.<sup>32</sup> AK Steel's Middletown, Ohio mill, its largest, is running at volumes 30-40 percent less than full utilization.<sup>33</sup> At the end of October, AK Steel

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<sup>29</sup> "Severstal to idle Sparrows Point blast furnace until mid-January," *American Metal Markets*, November 14, 2008.

<sup>30</sup> "AK Steel cuts jobs at its Coshocton, Ohio stainless plant," *American Metal Market*, November 14, 2008.

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> "AK Steel shares tumble nearly 25% after output cuts set," *American Metal Market*, November 12, 2008.

revealed that it was reducing the number of shifts per week at the company's Rockport, Indiana finishing facility from 21 shifts per week to 15 shifts.<sup>34</sup>

On November 13, 2008, U.S. Steel, a company that competes directly with ThyssenKrupp in the carbon steel flat-rolled market, announced that it was laying off 500 workers in its facilities in Fairfield, Alabama; Pittsburgh, Pennsylvania; Detroit, Michigan; and Granite City, Illinois.<sup>35</sup> All of these facilities produce flat-rolled carbon steel products.<sup>36</sup>

On November 3, 2008, Allegheny Ludlum, another company that competes directly with ThyssenKrupp in the stainless steel flat products market, announced that it was laying off 20 percent of its workforce producing flat-rolled stainless and specialty steel.<sup>37</sup> Allegheny Ludlum produces these products in Pennsylvania, Ohio, Indiana, Massachusetts, and Connecticut.

The USW is concerned that these announced plant closures and layoffs may be just the beginning of a much more protracted downturn that could result in measures to curtail production in the face of evaporating demand.

## **II. CONCLUSION**

The USW respectfully requests that the Board review carefully the application for FTZ subzone status for ThyssenKrupp's facility in light of the statutory factors that Congress has enacted to ensure that only FTZ applications that are truly in the public interest are approved. It

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<sup>34</sup> "AK backpedals, setting Ohio plant idling and 350 job cuts," *American Metal Market*, October 29, 2008.

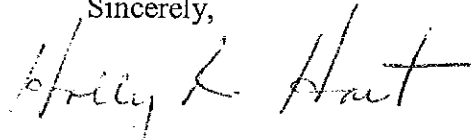
<sup>35</sup> "US Steel lays off 677 North American workers," *American Metal Market*, November 13, 2008.

<sup>36</sup> *Id.*

<sup>37</sup> "ATI's Ludlum subsidiary braces for 20% workforce reduction," *American Metal Market*, November 3, 2008.

is the view of the USW that ThyssenKrupp's application fails to meet this test and thus should be rejected outright.

Sincerely,

A handwritten signature in cursive script, appearing to read "Holly R. Hart".

Holly R. Hart  
Legislative Director

Attachments: Exhibit 1, Basic Steel Industry Conference  
Exhibit 2, chart - AD & CVD Orders by Product Group

**EXHIBIT 1:**

**BASIC STEEL INDUSTRY  
CONFERENCE**



# Basic Steel Industry Conference

Leo Gerard, International President

Pittsburgh, Pennsylvania  
December 17, 2007



# The State of Steel

Tom Conway, International Vice  
President

Basic Steel Industry Conference  
Pittsburgh, Pennsylvania  
December 17, 2007

## The Steel Crisis - 1998-2003

- Collapse of Asian economies in late 1997 caused a wave of record steel imports.
- After a brief recovery in 1999/2000, the “roof caved in” .
- Steel prices fell to 20-year lows
- 55,000 steelworker jobs were lost.
- \$12 billion in net losses during 2000-2003
- 45 bankruptcy filings, including 18 plant shutdowns.
- 16 distress pension plan terminations by PBGC, involving over 250,000 participants and \$10 billion in underfunded benefits.
- Loss of retiree health care for over 300,000 retirees and dependents.



## **EXHIBIT 2:**

# **AD & CVD ORDERS BY PRODUCT GROUP**

**ANTIDUMPING AND COUNTERVAILING DUTY ORDERS IN PLACE AS OF  
SEPTEMBER 10, 2008, BY PRODUCT GROUP**

Order date	Continued date	ITC case No. <sup>1</sup>	DOC case No.	Review sequence group No.	Product group <sup>2</sup>	Product	Country
11/08/02		A-984	A-437-804	111	CH	Sulfanilic acid	Hungary
11/08/02		A-985	A-471-806	111	CH	Sulfanilic acid	Portugal
11/08/02		C-426	C-437-805	111	CH	Sulfanilic acid	Hungary
07/02/03		A-1016	A-588-861	116	CH	Polyvinyl alcohol	Japan
07/09/03		A-1013	A-570-878	117	CH	Saccharin	China
10/01/03		A-1014	A-570-879	116	CH	Polyvinyl alcohol	China
10/01/03		A-1017	A-580-850	116	CH	Polyvinyl alcohol	Korea
10/01/03		A-1020	A-570-880	120	CH	Barium carbonate	China
11/19/03		A-1022	A-570-882	122	CH	Refined brown aluminum oxide	China
08/06/04		A-1046	A-570-887	127	CH	Tetrahydrofurfuryl alcohol	China
12/29/04		A-1060	A-570-892	131	CH	Carbazole Violet Pigment 23	China
12/29/04		A-1061	A-533-838	131	CH	Carbazole Violet Pigment 23	India
12/29/04		C-437	C-533-839	131	CH	Carbazole Violet Pigment 23	India
06/24/05		A-1082	A-570-898	136	CH	Chlorinated Isocyanurates	China
06/24/05		A-1083	A-469-814	136	CH	Chlorinated Isocyanurates	Spain
07/11/05		A-1084	A-405-803	137	CH	Carboxymethylcellulose	Finland
07/11/05		A-1085	A-201-834	137	CH	Carboxymethylcellulose	Mexico
07/11/05		A-1086	A-421-811	137	CH	Carboxymethylcellulose	Netherlands
07/11/05		A-1087	A-401-808	137	CH	Carboxymethylcellulose	Sweden
06/01/07		A-1104	A-570-905	142	CH	Certain polyester staple fiber	China
04/27/07		A-1103	A-570-904	142	CH	Certain activated carbon	China
03/18/08		A-1110	A-570-908	145	CH	Sodium Hexametaphosphate	China
08/27/08		A-1136	A-570-925	150	CH	Sodium nitrite	China
08/27/08		A-1137	A-428-841	150	CH	Sodium nitrite	Germany
08/27/08		C-453	C-570-926	150	CH	Sodium nitrite	China
08/11/03		C-431	C-580-851	118	ELC	Dynamic random access memory semiconductors	Korea
08/17/93	02/14/07	C-350	C-580-818	79	ISM	Corrosion-resistant carbon steel flat products	Korea

**ANTIDUMPING AND COUNTERVAILING DUTY ORDERS IN PLACE AS OF  
SEPTEMBER 10, 2008, BY PRODUCT GROUP**

Order date	Continued date	ITC case No. <sup>1</sup>	DOC case No.	Review sequence group No.	Product group <sup>2</sup>	Product	Country
08/19/93	02/14/07	A-616	A-428-815	79	ISM	Corrosion-resistant carbon steel flat products	Germany
08/19/93	02/14/07	A-618	A-580-816	79	ISM	Corrosion-resistant carbon steel flat products	Korea
12/01/93	08/08/06	A-638	A-533-808	65	ISM	Stainless steel wire rod	India
02/21/95	01/23/07	A-678	A-351-825	85	ISM	Stainless steel bar	Brazil
02/21/95	01/23/07	A-679	A-533-810	85	ISM	Stainless steel bar	India
02/21/95	01/23/07	A-681	A-588-833	85	ISM	Stainless steel bar	Japan
03/02/95	01/23/07	A-682	A-469-805	85	ISM	Stainless steel bar	Spain
07/02/96	03/22/07	A-739	A-588-838	96	ISM	Clad steel plate	Japan
04/17/97	03/26/03	A-745	A-489-807	3	ISM	Steel concrete reinforcing bar	Turkey
10/24/97	10/21/03	A-753	A-570-849	7	ISM	Carbon steel plate	China
10/24/97	09/17/03	A-754	A-821-808	7	ISM	Carbon steel plate (Suspended)	Russia
10/24/97	09/17/03	A-756	A-823-808	7	ISM	Carbon steel plate (Suspended)	Ukraine
09/15/98	08/13/04	A-770	A-475-820	10	ISM	Stainless steel wire rod	Italy
09/15/98	08/13/04	A-771	A-588-843	10	ISM	Stainless steel wire rod	Japan
09/15/98	08/13/04	A-772	A-580-829	10	ISM	Stainless steel wire rod	Korea
09/15/98	08/13/04	A-773	A-469-807	10	ISM	Stainless steel wire rod	Spain
09/15/98	08/13/04	A-775	A-583-828	10	ISM	Stainless steel wire rod	Taiwan
05/11/99	07/18/05	C-376	C-423-809	18	ISM	Stainless steel plate in coils	Belgium
05/11/99	07/18/05	C-379	C-791-806	18	ISM	Stainless steel plate in coils	South Africa
05/21/99	07/18/05	A-788	A-423-808	18	ISM	Stainless steel plate in coils	Belgium
05/21/99	07/18/05	A-790	A-475-822	18	ISM	Stainless steel plate in coils	Italy
05/21/99	07/18/05	A-791	A-580-831	18	ISM	Stainless steel plate in coils	Korea
05/21/99	07/18/05	A-792	A-791-805	18	ISM	Stainless steel plate in coils	South Africa
05/21/99	07/18/05	A-793	A-583-830	18	ISM	Stainless steel plate in coils	Taiwan

**ANTIDUMPING AND COUNTERVAILING DUTY ORDERS IN PLACE AS OF  
SEPTEMBER 10, 2008, BY PRODUCT GROUP**

Order date	Continued date	ITC case No. <sup>1</sup>	DOC case No.	Review sequence group No.	Product group <sup>2</sup>	Product	Country
06/29/99	05/26/05	A-807	A-588-846	24	ISM	Hot-rolled carbon steel flat products	Japan
07/06/99	05/26/05	A-806	A-351-828	24	ISM	Hot-rolled carbon steel flat products	Brazil
07/06/99	05/26/05	C-384	C-351-829	24	ISM	Hot-rolled carbon steel flat products	Brazil
07/12/99	06/03/05	A-808	A-821-809	24	ISM	Hot-rolled carbon steel flat products (Suspended)	Russia
07/27/99	08/04/05	A-798	A-428-825	25	ISM	Stainless steel sheet & strip	Germany
07/27/99	08/04/05	A-799	A-475-824	25	ISM	Stainless steel sheet & strip	Italy
07/27/99	08/04/05	A-800	A-588-845	25	ISM	Stainless steel sheet & strip	Japan
07/27/99	08/04/05	A-801	A-580-834	25	ISM	Stainless steel sheet & strip	Korea
07/27/99	08/04/05	A-802	A-201-822	25	ISM	Stainless steel sheet & strip	Mexico
07/27/99	08/04/05	A-803	A-583-831	25	ISM	Stainless steel sheet & strip	Taiwan
08/06/99	08/04/05	C-382	C-580-835	25	ISM	Stainless steel sheet & strip	Korea
02/10/00	12/06/05	A-817	A-533-817	40	ISM	Carbon steel plate	India
02/10/00	12/06/05	A-818	A-560-805	40	ISM	Carbon steel plate	Indonesia
02/10/00	12/06/05	A-819	A-475-826	40	ISM	Carbon steel plate	Italy
02/10/00	12/06/05	A-820	A-588-847	40	ISM	Carbon steel plate	Japan
02/10/00	12/06/05	A-821	A-580-836	40	ISM	Carbon steel plate	Korea
02/10/00	12/06/05	C-388	C-533-818	40	ISM	Carbon steel plate	India
02/10/00	12/06/05	C-389	C-560-806	40	ISM	Carbon steel plate	Indonesia
02/10/00	12/06/05	C-390	C-475-827	40	ISM	Carbon steel plate	Italy
02/10/00	12/06/05	C-391	C-580-837	40	ISM	Carbon steel plate	Korea
08/28/00	07/21/06	A-860	A-588-854	74	ISM	Tin mill products	Japan
09/07/01	08/09/07	A-873	A-822-804	92	ISM	Steel concrete reinforcing bar	Belarus
09/07/01	08/09/07	A-874	A-570-860	92	ISM	Steel concrete reinforcing bar	China
09/07/01	08/09/07	A-875	A-560-811	92	ISM	Steel concrete reinforcing bar	Indonesia

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Order date	Continued date	ITC case No. <sup>1</sup>	DOC case No.	Review sequence group No.	Product group <sup>2</sup>	Product	Country
09/07/01	08/09/07	A-878	A-449-804	92	ISM	Steel concrete reinforcing bar	Latvia
09/07/01	08/09/07	A-879	A-841-804	92	ISM	Steel concrete reinforcing bar	Moldova
09/07/01	08/09/07	A-880	A-455-803	92	ISM	Steel concrete reinforcing bar	Poland
09/07/01	08/09/07	A-882	A-823-809	92	ISM	Steel concrete reinforcing bar	Ukraine
11/29/01	12/27/07	A-899	A-570-865	93	ISM	Hot-rolled carbon steel flat products	China
11/29/01	12/27/07	A-906	A-583-835	93	ISM	Hot-rolled carbon steel flat products	Taiwan
11/29/01	12/27/07	A-907	A-549-817	93	ISM	Hot-rolled carbon steel flat products	Thailand
11/29/01	12/27/07	A-908	A-823-811	93	ISM	Hot-rolled carbon steel flat products	Ukraine
12/03/01	12/27/07	A-900	A-533-820	93	ISM	Hot-rolled carbon steel flat products	India
12/03/01	12/27/07	A-901	A-560-812	93	ISM	Hot-rolled carbon steel flat products	Indonesia
12/03/01	12/27/07	C-405	C-533-821	93	ISM	Hot-rolled carbon steel flat products	India
12/03/01	12/27/07	C-406	C-560-813	93	ISM	Hot-rolled carbon steel flat products	Indonesia
12/03/01	12/27/07	C-408	C-549-818	93	ISM	Hot-rolled carbon steel flat products	Thailand
03/07/02		A-913	A-427-820	103	ISM	Stainless steel bar	France
03/07/02		A-914	A-428-830	103	ISM	Stainless steel bar	Germany
03/07/02		A-915	A-475-829	103	ISM	Stainless steel bar	Italy
03/07/02		A-916	A-580-847	103	ISM	Stainless steel bar	Korea
03/07/02		A-918	A-412-822	103	ISM	Stainless steel bar	United Kingdom
03/08/02		C-413	C-475-830	103	ISM	Stainless steel bar	Italy
10/22/02	07/30/08	C-417	C-351-833	110	ISM	Carbon steel wire rod	Brazil
10/29/02	07/30/08	A-953	A-351-832	110	ISM	Carbon steel wire rod	Brazil
10/29/02	07/30/08	A-957	A-560-815	110	ISM	Carbon steel wire rod	Indonesia
10/29/02	07/30/08	A-958	A-201-830	110	ISM	Carbon steel wire rod	Mexico
10/29/02	07/30/08	A-959	A-841-805	110	ISM	Carbon steel wire rod	Moldova

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Order date	Continued date	ITC case No. <sup>1</sup>	DOC case No.	Review sequence group No.	Product group <sup>2</sup>	Product	Country
10/29/02	07/30/08	A-961	A-274-804	110	ISM	Carbon steel wire rod	Trinidad & Tobago
10/29/02	07/30/08	A-962	A-823-812	110	ISM	Carbon steel wire rod	Ukraine
12/08/78	06/25/04	AA-188	A-588-068	12	ISO	Prestressed concrete steel wire strand	Japan
11/13/85	09/20/04	A-208	A-357-405	19	ISO	Barbed wire & barless wire strand	Argentina
03/05/86	06/29/05	A-263	A-122-503	32	ISO	Iron construction castings	Canada
05/09/86	06/29/05	A-262	A-351-503	32	ISO	Iron construction castings	Brazil
05/09/86	06/29/05	A-265	A-570-502	32	ISO	Iron construction castings	China
05/15/86	06/29/05	C-249	C-351-504	32	ISO	Heavy iron construction castings	Brazil
12/17/86	11/21/05	A-308	A-351-602	37	ISO	Carbon steel butt-weld pipe fittings	Brazil
12/17/86	11/21/05	A-310	A-583-605	37	ISO	Carbon steel butt-weld pipe fittings	Taiwan
02/10/87	11/21/05	A-309	A-588-602	37	ISO	Carbon steel butt-weld pipe fittings	Japan
06/15/87	09/15/06	A-344	A-570-601	61	ISO	Tapered roller bearings	China
03/25/88	10/20/05	A-376	A-588-702	43	ISO	Stainless steel butt-weld pipe fittings	Japan
05/15/89	09/15/06	A-391-A	A-428-801	61	ISO	Ball bearings	Germany
05/15/89	09/15/06	A-392-A	A-427-801	61	ISO	Ball bearings	France
05/15/89	09/15/06	A-393-A	A-475-801	61	ISO	Ball bearings	Italy
05/15/89	09/15/06	A-394-A	A-588-804	61	ISO	Ball bearings	Japan
05/15/89	09/15/06	A-399-A	A-412-801	61	ISO	Ball bearings	United Kingdom
07/06/92	11/21/05	A-520	A-570-814	37	ISO	Carbon steel butt-weld pipe fittings	China
07/06/92	11/21/05	A-521	A-549-807	37	ISO	Carbon steel butt-weld pipe fittings	Thailand
02/23/93	10/20/05	A-563	A-580-813	43	ISO	Stainless steel butt-weld pipe fittings	Korea
06/16/93	10/20/05	A-564	A-583-816	43	ISO	Stainless steel butt-weld pipe fittings	Taiwan
02/09/94	01/23/06	A-639	A-533-809	70	ISO	Forged stainless steel flanges	India
02/09/94	01/23/06	A-640	A-583-821	70	ISO	Forged stainless steel flanges	Taiwan